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Naval Base Coronado

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TAB-1

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Naval Base Coronado, N3, (619) 921-4875
CDR A. S. Jouhal

TAB-2
EXECUTIVE SUMMARY

Subject: (b)(5)

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Naval Base Coronado, N3, (b)(6)
CDR A. S. Jouhal

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Naval Base Coronado, N3, (b)(6)

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Installation Restoration Sites (IR)	-Potential effect to multiple IR sites	-Potential effect to two IR sites	- (b)(6) (b)(6)	No Change
Coastal Zone Management	-Direct affect to coastal zone resources	-Direct affect to coastal zone resources.	-Direct affect to coastal zone resources.	No Change
Traffic	-67,000 truck trips (or barge) for concrete, construction fill and debris	-14,000 truck trips (or barge) for concrete, construction fill and debris	(b)(6) truck trips (or barge) for concrete, construction fill and debris (b)(6)	No Change
Timeline	11-25 years	11-25 years	(b)(6) (b)(6)	N/A
Total Cost (approx.)	\$320,000,000	\$327,000,000	(b)(6) (b)(6)	N/A

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Naval Base Coronado, N3, (b)(6)
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TAB 4

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Naval Base Coronado, N3, (b)(6)
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Naval Base Coronado, N3, (b)(6)
CDR A. S. Jouhal

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TAB-7

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TAB-8
Official Letters and Associated Responses

1. ASN (EI&E) Response Ltr to Mayor of Coronado, 1 Oct, 2012
2. Mayor of Coronado Ltr to Secretary of the Navy, 29 Aug, 2012
3. Secretary of the Navy Response Ltr to Senator Boxer, 15 Aug, 2012
4. Secretary of the Navy Response Ltr to Senator Feinstein, 15 Aug, 2012
5. Senators Boxer and Feinstein Ltr to Secretary of the Navy, 30 Jul, 2012
6. Congressman Bilbray Ltr to CNO, 4 Jun, 2012

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DEPARTMENT OF THE NAVY
THE ASSISTANT SECRETARY OF THE NAVY
(ENERGY, INSTALLATIONS AND ENVIRONMENT)
1000 NAVY PENTAGON
WASHINGTON DC 20350-1000

OCT 1 2012

The Honorable Casey Tanaka
Mayor, City of Coronado
1825 Strand Way
Coronado, CA 92118

Dear Mayor Tanaka:

Thank you for your letter of August 29, 2012, to the Secretary of the Navy regarding the recent update to the Naval Air Station (NAS) North Island Air Installation Compatible Use Zone (AICUZ) Study. I am responding on behalf of the Secretary.

The Navy enjoys a good working relationship with the city of Coronado, and is always interested in continued cooperation with the City to seek mutually beneficial solutions. With that in mind, and in partial, positive response to one of the requests made at the end of your letter, the Navy will revisit the data that caused the Navy to conclude that a displaced threshold and other Runway 29 alignment proposals would not be acceptable. Upon conclusion of this effort, I will advise you of the results.

It is important to note that, as stated in the AICUZ, the AICUZ plan should be used as a guide for the review and update of the City's community and general plans. The AICUZ reflects the noise and accident potential effects of NAS North Island operations. The Navy's agreement to look at certain issues in accordance with your request should not be used as a reason to delay or alter planning efforts governing development within areas covered by the AICUZ.

As previously indicated, I will advise you upon the conclusion of our review. As always, please let me know if I can be of further assistance. Thank you for your continued support of the men and women of the Navy.

Sincerely,

A handwritten signature in black ink, appearing to read "Roger M. Natsuhara".
Roger M. Natsuhara
Acting

Naval Base Coronado, N3, (b)(6)
CDR A. S. Jouhal



CITY OF CORONADO

OFFICE OF THE MAYOR
CASEY TANAKA

1825 STRAND WAY • CORONADO, CA 92118 • (619) 522-7320 • CTANAKA@CORONADO.CA.US

August 29, 2012

The Honorable Ray Mabus
Secretary of the Navy
Office of the Secretary of the Navy
United States Department of the Navy
The Pentagon, Room 4E686
Washington, DC 20350

Dear Secretary Mabus:

Recently, Senators Feinstein and Boxer wrote to you regarding the changes in the Navy's recent Air Installation Compatible Use Zones (AICUZ) for Naval Air Station North Island located in the City of Coronado. I am writing to add my support to Senators Feinstein and Boxer's correspondence. As Mayor of the City of Coronado, I am very concerned that the recent AICUZ will impose land use restrictions on hundreds of commercial and residential properties within the City of Coronado, including the historic Hotel del Coronado, while offering no mitigation of any kind by the U.S. Navy to counterbalance the economic impacts of these AICUZ recommendations on Coronado's property owners.

As you may know, the Navy has supported California's legislation that requires the San Diego County Airport Land Use Commission to adopt the recommendations from the Navy's 2012 AICUZ for NASNI as the Airport Land Use Compatibility Plan (ALUCP) for Coronado making the provisions of the AICUZ mandatory on properties within the City of Coronado. This is unfortunate considering that the private property uses being affected by the AICUZ existed long before the construction of runway 29 at Naval Air Station North Island.

What this means is that these properties will have to be re-zoned as "legal non-conforming" uses. This designation will limit future development to activities that do not intensify the use. This is particularly troubling for commercial properties located in Accident Potential Zone 1 where only passive type uses are allowed by the AICUZ (cemeteries, parks, farming). Any change in commercial tenants, such as converting a retail space to a restaurant for example, will not be allowed - as it "intensifies" the use.

The City of Coronado and the Navy have flourished together in Coronado for many years. Coronado has supported and embraced the Navy for well over a century. We continue to work with the local command to address issues of traffic and the expansion of the Navy's presence in our community.

Naval Base Coronado, N3, (b)(6)
CDR A. S. Jouhal



Secretary Mabus
Page 2
August 29, 2012

For years the City of Coronado has left it up to the Navy to carry out its affairs on its side of the Blue Line, with the understanding that the Navy would not impose upon the affairs of the City. However, with this newest AICUZ, the Navy has actively lobbied against our efforts to modify State law to make the AICUZ voluntary on the City (as it is for the Navy) and the Navy has downplayed the consequences of the AICUZ by suggesting the City could override the findings of the Airport Land Use Commission -- when it is well known that the courts have set a very high standard for any such override and it is unlikely such an override could be achieved.

All this leads me back to the recommendations contained in Senators Feinstein and Boxer's letter. If you agree, as I do, that a long-term solution would be the best result for both the Navy and the City, I ask you to consider the following:

1. Conduct a comprehensive study of the alignment of runway 29. The 1984 AICUZ recommended that the runway threshold should be displaced to remove City property from the Clear Zone. The 2012 AICUZ now states the displacement would create unacceptable changes to NAS North Island airfield operations ... which result from immovable physical obstructions. It is our understanding that a comprehensive study of the runway has not been conducted but rather the conclusion cited in the 2012 AICUZ was based on anecdotal information.


Conducting this study and the associated environmental process will provide the public with a clear understanding of the airport configuration and the cost/benefit of any possible solutions from both the Navy and City perspective. If it is concluded the citizens and residents of Coronado are not safe due to activities of the Navy, it is critical that the Navy mitigate the danger posed to residents and businesses.

2. Alternatively, the Navy can work with the City in developing a solution that considers the unique historical context of the land uses in the City of Coronado. This could be in the form of:
 - a. Supporting the City's efforts to exempt itself from State legislation to allow the 2011 AICUZ to be voluntarily applied to land uses in Coronado.
 - b. Modify the Navy's AICUZ instructions to allow the consideration of local conditions when drawing the Accidental Potential Zones, as was done in the 1984 AICUZ, and redraft the AICUZ to reflect the pragmatic local circumstances.

The Navy has informed us that operations at North Island are no different today than in 1984. The change in the 2012 AICUZ from the 1984 AICUZ was a unilateral decision of the Navy to reflect the self-established standards of the Department of Defense. In this sense, the AICUZ is subjective.

Thank you for your thorough and sympathetic consideration of our proposed solutions.

Sincerely,


Casey Tanaka
Mayor

CT/mlc
attachment
cc: City Council

(b)(6)
Naval Base Coronado, N3, (b)(6)
CDR A. S. Jouhal



THE SECRETARY OF THE NAVY
WASHINGTON, D. C. 20350-1000

August 15, 2012

The Honorable Barbara Boxer
United States Senate
Washington, DC 20510-0505

Dear Senator Boxer:

Thank you for your letter of July 30, 2012, concerning the recently published Air Installation Compatible Use Zone study (AICUZ) for Naval Air Station (NAS) North Island. I am responding for Secretary Mahus, who is on travel. I appreciate your recognition of the importance of the AICUZ as it is a key tool in addressing our mutual concerns regarding the safety of the nearby residents and business owners.

An AICUZ is required for all Department of Defense (DoD) airfields in order to promote long-term compatible land use on and in the vicinity of air installations. As part of the NAS North Island AICUZ, the Department of the Navy (DON) reviewed the requirements and characteristics associated with NAS North Island operations to update a 1984 AICUZ. In consideration of local and regional concerns, the installation was able to make a number of changes to address the effect of air operations on the community. These changes included curving the Accident Potential Zones (APZs) seaward to the extent operationally feasible, eliminating touch-and-go operations, limiting overhead break landings, limiting night and weekend operations, and designating Runway 18 as the primary departure runway. Realignment of Runway 29 is not a viable option, however, as significant and cascading impacts to both military and civilian operations, to include the San Diego International Airport and surrounding southern California airspace, would result. Finally, the AICUZ update confirmed that Runway 29 is the only appropriate arrival runway at NAS North Island.

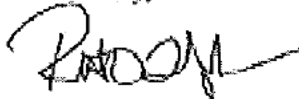
The APZ and Clear Zone (CZ) delineations at NAS North Island were developed in accordance with DoD and DON directives, and are based upon statistical analysis and operational requirements. These delineations accurately reflect current Navy operations at NAS North Island. The CZ for Runway 29 did not change from the 1984 AICUZ nor did the APZ for Runway 29 expand from the 1984 AICUZ. The APZ was realigned, however, to accurately reflect current operations on Runway 29.

The DON, and in particular NAS North Island, enjoys a good working relationship with the local and regional community. We will continue to work cooperatively with the City of Coronado, its residents and the San Diego Regional Airport Land Use Commission throughout the local planning process to ensure the recommendations of the AICUZ are accurately interpreted. I recognize the importance of continued cooperation

Naval Base Coronado, N3, (b)(6)
CDR A. S. Jouhal

with the City and will continue to seek mutually beneficial solutions. Thank you for your continued support of the men and women of the Navy. A similar letter has been sent to Senator Feinstein.

Sincerely,

A handwritten signature in black ink, appearing to read "RO Work", with a stylized flourish extending to the right.

Robert O. Work
Acting

(b)(6)
Naval Base Coronado, N3, (b)(6)
CDR A. S. Jouhal



THE SECRETARY OF THE NAVY
WASHINGTON, D.C. 20350-1000

August 15, 2012

The Honorable Diane Feinstein
United States Senate
Washington, DC 20510-0504

Dear Senator Feinstein:

Thank you for your letter of July 30, 2012, concerning the recently published Air Installation Compatible Use Zone study (AICUZ) for Naval Air Station (NAS) North Island. I am responding for Secretary Mahus, who is on travel. I appreciate your recognition of the importance of the AICUZ as it is a key tool in addressing our mutual concerns regarding the safety of the nearby residents and business owners.

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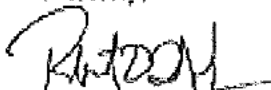
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Naval Base Coronado, N3, (b)(6)
CDR A. S. Jouhal

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Sincerely,

A handwritten signature in black ink, appearing to read "R. Work", with a stylized flourish extending to the right.

Robert O. Work
Acting

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1. *Staphylococcus aureus* (Staph. aureus) is a common cause of skin infections, such as abscesses, boils, and impetigo. It is also a leading cause of hospital-acquired infections, including pneumonia, bloodstream infections, and surgical site infections.

Naval Base Coronado, N3, (b)(6)
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As a result of the above, the following is a list of the proposed work items for the proposed project. The work items are listed in the order of priority and are subject to change as the project progresses. The work items are listed in the order of priority and are subject to change as the project progresses.

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CDR A. S. Jouhal

CDR A. S. Jouhal
Naval Base Coronado

CDR A. S. Jouhal
Naval Base Coronado

Naval Base Coronado, N3, (b)(6)
CDR A. S. Jouhal

BRIAN P. BILBRAY
60th District, Congressman
2410 AVENUE HOUSE OFFICE BUILDING
WASHINGTON, DC 20515
(202) 215-0510
FAX (202) 215-2550
DISTRICT OFFICE:
990 BRYAN AVE., #212
SOLANA BEACH, CA 92075
(858) 350-1150
FAX (858) 350-0710
June 4, 2012

Congress of the United States
House of Representatives
Washington, DC 20515-0550

COMMITTEE ON
ENERGY AND COMMERCE
SUBCOMMITTEE ON
ENERGY AND POWER
SUBCOMMITTEE ON
COMMUNICATIONS AND TECHNOLOGY
SUBCOMMITTEE ON
OCEANOGRAPHY AND INVESTIGATION
HOUSE REPUBLICAN
POLICY COMMITTEE
MEMBERSHIP
BRIAN P. BILBRAY
60th District, Congressman

Admiral Jonathan W. Greenert
Chief of Naval Operations
Office of the Chief of Naval Operations
2000 Navy Pentagon
Washington, D.C. 20350-2000

Dear Admiral Greenert,

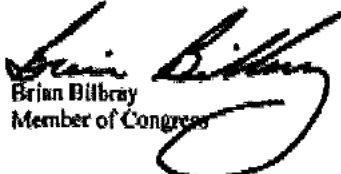
In the final Air Installations Compatible Use Zones (AICUZ) study for Naval Air Station (NAS) North Island, it has come to my attention that the updated accident potential "crash zone" area includes upwards of 200 homes and various places of businesses. The previous AICUZ report, created in 1984, included only a small footprint of Coronado, California, with approximately 30 homes in the accident potential zone. Recently, a spokeswoman for Naval Air Station (NAS) North Island stated, "It (AICUZ) was changed because there was a change in operation, there are new aircraft and that's going to dictate the accident potential zones."

I am aware that the study is considered to be advisory, and that the primary goal of the AICUZ Program is to protect the health, safety, and welfare of those living on and near a military airfield while preserving the operational capability of the airfield. However, a new state law requires the City of Coronado to comply with Navy recommendations outlined in the AICUZ report. As many oceanfront properties are now in the middle of the crash area, I am concerned that implementation of the new program could have potentially negative consequences on the local community in the forms of possible higher insurance rates, zoning law restrictions, changes to building codes, and reduction of property value that collectively stifle economic growth.

Although the final study states, "during the intervening quarter century since the previous AICUZ studies were published, numerous changes have occurred in aircraft platforms flown in the Navy, the science of noise modeling has advanced, and noise models used by DOD have improved," I would appreciate further clarification and specific details as to why the Department of the Navy is proposing a new AICUZ for NAS North Island at this particular time. In addition, I would also appreciate your office providing me with specific details as to why the accident potential crash zone has been expanded to include such a large residential and business area, in comparison with the 1984 study.

Thank you for your attention to this matter, and I look forward to your response. If you have any questions, or require any additional information, please do not hesitate to contact Will Zasady in my Solana Beach office at (858) 350-1150.

Sincerely,


Brian Bilbray
Member of Congress

PERIODIC OFFICIAL MAIL

TAB-9

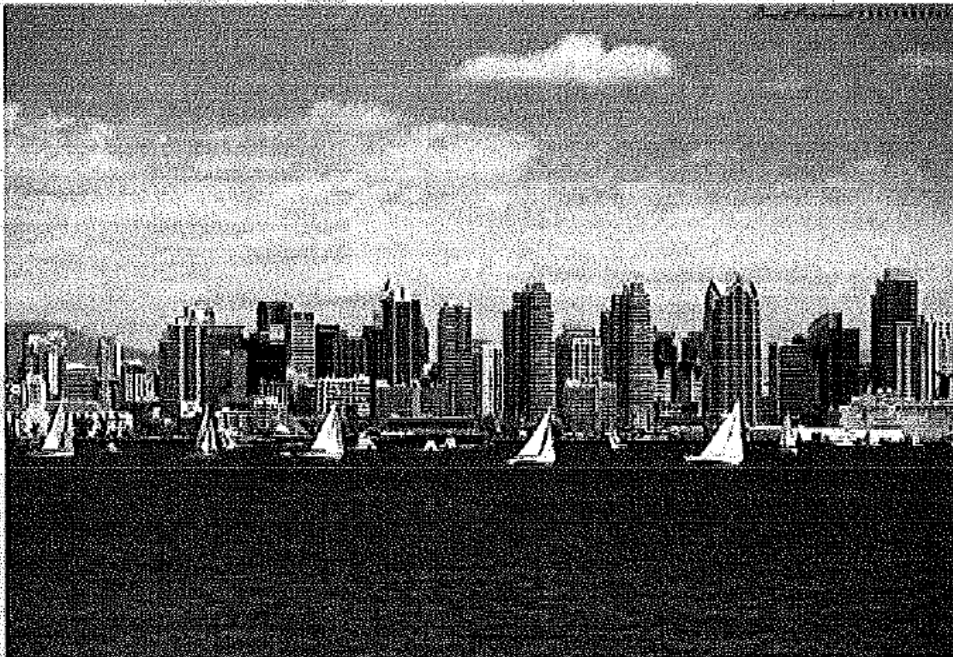
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- 1) Coronado properties in the Clear Zone from the 1984 AICUZ to the 2011 AICUZ are unchanged:
 - a) Accident Potential Zones I and II from the 1984 AICUZ to the 2011 AICUZ were adjusted IAW OPNAV Instruction 11010.36C, accurately reflecting the current dominant approach of fixed wing aircraft operations. This change in APZ I and II zones encompassed more properties from the 1984 AICUZ APZ I and II zones.
 - b) APZ I and II in both the 1984 AICUZ and 2011 AICUZ Study Updates include portions of the Hotel Del Coronado Hotel and Coronado Shores Condominiums.
- 2) Naval Base Coronado continues outreach and education on the NASNI AICUZ Study Update with local community, stakeholder agencies and organizations.
 - a) Conducted Public outreach in Cities of Imperial Beach and Coronado on 30 May 12 and 31 May 12, respectively.
 - b) Conducts monthly coordination with City of Coronado staff.
 - c) Conducts quarterly coordination with City of Imperial Beach.
 - d) NBC CO appointed to an ex parte position on San Diego Airport Commission.
 - e) NBC CPLO conducts monthly coordination with San Diego County Regional Airport Authority Planning Director preparing for development of NASNI and NOLFIB ALUCP.
 - f) Conducts joint presentations with San Diego County Regional Airport Authority Planning Director relating to NASNI AICUZ and the pending NASNI Airport Land Use Compatibility Plan for NASNI and NOLFIB:
 - i) 22 Jun 12 San Diego Association of Realtors, Government Affairs Committee.
 - ii) 13 Sept 12, California Transportation and Airport Commissions Seminar.
 - iii) 26 Sept 12 City of Coronado Association of Realtors.

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- 4) In the past, City of Coronado has exercised its land use authority by considering airport planning professionals (see attached Walter E. Gillfillan and Associates to challenge Navy AICUZ APZ land use density and land use recommendations, Conclusion page 5).
- 5) NBC immediately delivered the NASNI and NOLFIB AICUZ Study Update to the City of Coronado, City of Imperial Beach, San Diego County Regional Airport Authority and other federal, state, and local agencies within the AICUZ/Military Influence area.

Local Area Disclosures for San Diego County



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LOCAL AREA DISCLOSURES FOR SAN DIEGO COUNTY

D. Air Traffic and Airport Disclosures

Buyer is advised to investigate the area in which Buyer is considering purchasing a residence for potential impacts from aircraft noise, flyovers or airports. These disclosures are not an exhaustive list of airport or air fields that may affect county residents.

1. Aircraft Noise—General

Buyer and Seller are advised that some areas are subject to noise emitted by military and/or civilian aircraft including helicopters. Properties near a commercial airport or military facility, may be impacted in their use and enjoyment. If a Property is in the vicinity of the following civilian airports or military air fields, further information may be obtained by contacting the appropriate airport management:

(a) Agua Caliente Springs, (b) Borrego Valley Airport, (c) Brown Field, (d) Fallbrook Airpark, (e) Gillespie Field, (f) Jacumba, (g) Marine Corps Air Station Miramar, (h) Marine Corps Base Camp Pendleton, (i) McClellan-Palomar, (j) Montgomery Field, (k) Naval Air Station North Island, (l) Naval Outlying Field Imperial Beach, (m) Oceanside, (n) Ocotillo, (o) Ramona, (p) San Diego International, or private airports.

2. Aircraft Noise—MCAS Miramar, Camp Pendleton

- a. Buyer and Seller are advised that a Property may be located in an area subject to aircraft noise or impact associated with the over flight of aircraft, including helicopter, transition to and from Marine Corps Air Station (MCAS) Miramar. Helicopters regularly fly over the coast

and I-15 corridor to reach Camp Pendleton. Currently, there are no restrictions on the hours of operation for MCAS Miramar. If needed, it will operate 24 hours a day, seven days a week.

- b. Buyer and Seller are advised that impacts generated by the use of aircraft at MCAS Miramar may occur at a property and affect the use and enjoyment of the Property.
- c. Buyer and Seller are advised that further information may be obtained by reviewing the Final Environmental Impact Statement for Realignment of MCAS Miramar, available at many San Diego area public libraries, and contacting the Commanding General, Community Plans and Liaisons, MCAS Miramar, P.O. Box 452000, San Diego, CA 92145; (858) 577-6603.
- d. Buyer and Seller are advised that if the Property is located within a 25-mile radius of the U.S. Marine Corps Air Station or Camp Pendleton, military operations may have an impact on the Property.

3. Proposed Airport Sites

Buyer and Seller are advised that various areas in San Diego County have been proposed, or are being considered, as sites for a future international airport, including expanding Lindbergh Field. For further information contact the San Diego County Regional Airport Authority at www.san.org or visit SANDAG at www.sandag.org.

E. Specific Area Disclosures

These disclosures cover various communities and are not exhaustive. Buyer should not assume that any community not listed is free of concerns. Buyer is advised to investigate the area to learn what specific conditions may exist. Because services to the Property are affected by whether the Property is in an incorporated city or unincorporated area of the county, Buyer should verify the Property status.

1. COASTAL**a. California Coastal Commission**

Buyer and Seller are advised that development or construction on properties within the coastal zone may

be subject to the jurisdiction and regulations of the California Coastal Commission, or local regulations approved by the Coastal Commission. The coastal zone extends a great distance inland in various areas of San Diego County, depending upon the location of coastal habitat, sloughs, and other waterways affected by ocean tides. The development of beachfront property may also be impacted by the determination of "mean high tide lines" in relation to the boundary lines for beachfront property. For further information, contact the Coastal Commission at (619) 767-2370 or www.coastal.ca.gov.

Naval Base Coronado, N3, (b)(6)
CDR A. S. Jouhal

LOCAL AREA DISCLOSURES FOR SAN DIEGO COUNTY

b. Camp Pendleton

Buyer and Seller are advised that a live-fire artillery range exists at the Marine Corps Base, Camp Pendleton. Periodic training exercises occur at Camp Pendleton which includes the detonation of military ordnance. During training exercises, noise from the artillery and ordnance can be heard in some areas of North San Diego County. For further information, contact Camp Pendleton at (760) 725-4111 or visit www.cpp.usmc.mil. For noise inquiries, contact Range Operations Division Office at (760) 725-0358 during the hours of 7:30 a.m. to 4:30 p.m., Monday through Friday. After normal business hours (and weekends), contact the Command Duty Officer at (760) 725-5061.

c. Coronado Island (City of Coronado)

Buyer and Seller are advised that:

- i. Naval Base Coronado. This command comprises North Island Naval Station, Naval Amphibious Base Coronado, Outlying Landing Field Imperial Beach, and a number of other small facilities. Military ordnance, possibly including nuclear weapons, may be stored at these facilities. Nuclear powered warships moor at NAS North Island. For more information about Naval Base Coronado, visit its web site: www.cnfc.navy.mil/coronado/index.htm.
- ii. Traffic. Traffic to and from Naval Base Coronado can be heavy. Streets particularly affected are: First, Third, Fourth, Orange, Alameda, Ocean and Pomona. For more information about Naval Base Coronado, visit www.cnfc.navy.mil/coronado/index.htm.
- iii. Development. City of Coronado development and zoning standards have changed in recent years and may limit new construction or modifications to an existing structure. Buyer is urged to verify with the city before considering any such changes to a property.
- iv. Historic Demolition Ordinance. The City of Coronado has implemented an ordinance which may limit a Buyer's ability to modify or demolish older homes. Homes older than 75 years are automatically subject to City review before any significant changes are allowed. Buyer is urged to consult with the City if demolition or other modifications are contemplated. The City is developing a list of homes that require a Historic Review before a demolition

permit may be issued. Buyer is urged to verify with the City whether a particular property is affected.

- v. Coronado Shores Condominiums. Of the 10 Coronado Shores buildings, the following five buildings are without fire sprinklers: 1720, 1730, 1760, 1770 and 1830 Avenida del Mundo.
- vi. Bridge/Tunnel. The City of Coronado has been exploring the possibility of building a tunnel from the end of the Coronado Bridge to the North Island Naval Air Station. The goal is to reduce traffic through Coronado. If the Buyer is concerned about the possibility of the tunnel, Buyer is urged to check with the City about the status of the project.

2. NORTH COUNTY INLAND

a. Fallbrook (Unincorporated)

Buyer and Seller are advised that:

- i. Naval Weapons Station. The Naval Weapons Station stores explosives munitions, including napalm, and is located along the westerly boundary of Fallbrook, and may affect the value of a Property in the vicinity. For further information, contact (760) 731-3609, or www.cnfc.navy.mil. (See also Sections D.2 and E.1.b, above.)
- ii. Public Utility District. If the utility account of a previous owner of a Property within the Fallbrook Public Utility District is closed, delinquent or remains unpaid, the amount due will be transferred to the new owner of the Property after normal collection procedures are exhausted. As a result, and to prevent conflict, the District will accept payment of closing bills through escrow. For further information, obtain the status of a Property's account by calling the District's Customer Service number at (760) 728-1125. You can find additional information at www.fpubd.com.
- iii. Rosemary's Mountain Quarry. A rock quarry near the San Luis Rey River in Fallbrook has been proposed and is referred to as Rosemary's Mountain Quarry. Properties in the vicinity of rock quarries may experience occasional explosion noise, equipment noise and dust from the quarry operations. For further information, call (760) 731-0694; hotline (760) 391-6340; www.rosemarysquarry.com.

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MEMORANDUM

March 26, 2008

To: Kathy Breedlove
 From: Walter Gillilan
 Subject: Impact of Conference Center relocation re. NAS North Island AICUZ

GENERAL DESCRIPTION OF THE ISSUE

At the time of the certification of the Final Environmental Impact Report (FEIR) for the Hotel del Coronado Master Plan in January 2001, the project description included several new additions proposed on the hotel property. Among these additions, was the Glorietta Bay Conference Facility, with guest rooms, and proposed new South Beach Guestrooms located at the beach at the southern boundary of the Hotel property. The Conference Facility/Guestrooms and South Beach Guestrooms locations are shown in Exhibit A. The proposed Conference Facility was just outside of the outer edge of the Accident Potential Zone (APZ) APZ-II and Noise Zone 1 as defined in the 1984 Air Installations Compatibility Use Zones (AICUZ) study for the Naval Air Station North Island (NASNI), while the South Beach Guestrooms were located just inside of APZ-II. See Exhibit B.

After analyzing potential land use compatibility issues, the FEIR found that "Cumulative projects are not anticipated to conflict with the NASNI AICUZ" and that no mitigation measures were required.

It is currently proposed that a new location for the Conference Center be established southeast of the original Conference Facility site. At this new location, shown in Exhibit C, the Center would be located just inside the outer edge in the APZ-II/Noise Zone 1. The Conference Center building would also include 31 guestrooms.

The South Beach Guestrooms would be located adjacent to and south east of the existing 7-story Ocean Tower buildings, also shown in Exhibit C. There will be a total of 113 guestrooms in this location, as compared to the 67 guestrooms previously evaluated in the FEIR. Guestrooms are located around a center courtyard/pool area.

The issues to consider are whether the revised locations for the Conference Center and Guestrooms introduce changes in the levels of significance with respect to the criteria described by the Navy's AICUZ for NAS North Island for height of structures, noise impacts or safety.

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With respect to the height of structures, the proposed development is limited by ordinance to 40 feet above grade level and will be well below the existing structures of the seven-story Ocean Towers and the ten, 17-story Coronado Shores condominium towers to the southeast. The noise exposure is outside of the 65 CNEL criteria noted in the AICUZ study and would remain unchanged. Because of this, this evaluation is focused solely on the safety issue.

BACKGROUND

This evaluation focuses on land use compatibility issues related to the proposed development and possible changes in potential risk exposure from aircraft accidents to people and structures on the ground.

Relevant documents that were considered in the initial FEIR analysis were also reviewed in this analysis. These include the 1984 AICUZ Study, excerpts from the 1991 NAS Master Plan, the initial Master Plan for The Hotel del Coronado and information previously received from the Department of the Navy regarding changes in aircraft operations since the 1984 AICUZ. Based on information received from the City of Coronado, an updated AICUZ is in process but it is not known when it will be released. Among the indicators of current Navy operations are their published visual and instrument procedures including HOTEL VISUAL RWY 29 (2008), attached as Exhibit D, and TACAN RWY 29 (2008), attached as Exhibit E, considered in this analysis.

It should be noted that the California Public Utilities Code and the provisions of CEQA require that the CALTRANS Airport Compatibility Planning Handbook be considered. For military installations, the Handbook uses the safety criteria noted in OPNAV INSTRUCTION 11010.35.B. These references were also considered in this analysis.

Concept of Accident Potential Zones

As discussed in the initial FEIR analysis, the concept of Accident Potential Zones was developed based on statistical information compiled from a review of military aircraft operation records and intended to identify the pattern of accident sites and the likelihood of accidents occurring in areas around military air fields. The State of California has developed guidelines for similar zones beyond the Federal Aviation Administration Runway Protection Zones at the ends of runways at civilian airports, as well as incorporating the military criteria.

In both the military and civilian applications, the APZs are not precise indicators of safe and unsafe conditions. While the probability of aircraft accidents is very low, particularly accidents involving people and property on the ground, that probability is not zero. The zones provide information about the potential risks associated with aircraft operations. Use of the zones in land use planning does not insure that all aircraft accidents will occur within the zones, and is not a predictor that any accident will, in fact, occur.

The pattern of accidents shows a concentration close to the runway ends and along the extended runway centerlines. This is reflected in the three different zones that extend out from the runway end that have greater restrictions closer to the runway end.

This variation of accident risk along the flight path is recognized in the delineation of land areas near the air installations into three zones for measuring risk of accident during aircraft arrivals and departures. The Clear Zone which has the highest potential for accidents; APZ I which is characterized as having significant potential for aircraft

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accident damage, and APZ II which has limited, but measurable risk exposure. These zones for the NASNI AICUZ are shown in Exhibit B. Note that the extended runway centerline has been offset to reflect the special operational procedures at NASNI.

It is significant to note that there are no variations in the APZ definitions in the lateral direction. It is often assumed, incorrectly, that the risk exposure throughout each of the APZs is uniform from left to right of the flight path centerline as well as fore and aft. In fact, the pattern of accident sites concentrates in each of the zones near the centerline of flight paths, with the risk of accident diminishing moving from the flight path centerline towards the outer edge of the APZ, where the proposed Conference Center/Guestrooms and South Beach Guestrooms are located. A three dimensional illustration of this lateral risk variation as depicted in the CALTRANS Airport Compatibility Planning Handbook is attached as Exhibit F.

Compatibility Criteria

The APZs are defined areas which identify the exposure to people and property on the ground. The compatibility criteria that are applied to these areas are used to limit the consequences, should an accident occur. These are presented in the AICUZ document in four categories of land uses: Clearly Compatible; Normally Compatible; Normally Incompatible; and Clearly Incompatible. In addition, conditions involving occupancy and building coverage are sometimes suggested in the form of the maximum number of people per acre and the percentage of land area covered by buildings. These limits are intended to further reduce the consequences to life and property should an accident occur.

As was noted in the Initial FEIR analysis, the criteria in AICUZ provide no gradation of the risk of accident as they are applied to general land use categories. If these criteria are applied without interpretation, unusual results can occur in that a land use that is Clearly Incompatible in a specific APZ can become Clearly Compatible by crossing a boundary that is represented by the width of a line on the APZ map. This lack of gradation in the criteria, coupled with the general descriptors in risk exposure included in the APZ definitions, can easily cause counter-intuitive results unless interpretations are applied that recognize the reduced risk exposure at the outer boundaries of the APZs.

FINDINGS FROM INITIAL FEIR ANALYSIS

The APZs provide information about the potential for accidents, and the land use compatibility criteria provide the guidelines intended to minimize the consequences should an accident occur. Since local governments have the authority to plan for and to make land use decisions, the responsibility for interpretation of the Navy's APZ information and land use guidelines rests solely with local jurisdictions. In doing this, the concern for the public health, safety and welfare is a principal consideration. All relevant information with respect to the local environment, accident history, topography, existing land use, and design features should be considered in deciding whether a proposed land use is or is not compatible with flight operations.

With respect to the original Hotel del Coronado Master Plan, the following issues were considered (1) Changes in the operations at NAS that had occurred since 1964 that would reduce the accident potential, (2) lack of uniformity in risk exposure within the APZ's, (3) the interpretation of the Navy's land use guidelines and (4) the consideration of the consequences should an accident occur.

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Operational Changes

The initial FEIR analysis noted thirty-four changes in aircraft operations that had been effectuated by the Navy since 1984. Many of these changes affect Runway 29 approaches and influence the designation of the APZ's impacting the Hotel del Coronado. While many of these actions were taken in response to noise concerns, they also have the effect of reducing risk exposure to the existing hotel and the proposed new development.

Variation in Risk Exposure

In the FEIR analysis, the variation in the risk as analyzed for the development closest to the NAS that were located in the outer edges of APZ-I and APZ-II. Here, the interpretation of the relative risk exposure was an essential part of the evaluation of land use compatibility for development at the edges of the APZ given the lack of lateral risk variation identified within the APZ definitions. It was further noted that there was the open water area extending along one side of the operational flight paths to Runway 20.

In the original analysis of the Hotel del Coronado Master Plan, it was noted that the proposed new Glorietta Bay Conference Facility/Guest Rooms and Oxford Guestrooms would be outside of APZ-II and therefore, would not be subject to the compatibility criteria.

Consequences of An Accident

The consequence of an accident is the core of the public health, safety and welfare question for local government. The FEIR analysis noted that the existing concentration of people and buildings in and adjacent to the Clear Zone, APZ-I and APZ-II establishes an exposure suggesting that there will likely be injuries to people and damage to facilities on the ground in the unlikely event of an aircraft accident. Because of existing development, this possibility exists whether or not the proposed new development is added.

SPECIFIC PROPOSED CHANGES TO THE HOTEL MASTER PLAN

The proposed Conference Center is planned to accommodate up to approximately 1,000 people in approximately 20,000 square feet of meeting space, with 23 guestrooms. In the original Master Plan, the Glorietta Bay Facility/Guestrooms had proposed approximately 20,000 sq. ft. of meeting space and 31 guestrooms. The Center would be located a short distance (approximately 300 feet) closer to the shoreline and would extend about 250 feet inside of the 3,000 foot wide APZ-II, i.e., the outer edge of the APZ where the relative risk exposure is lowest.

The original South Beach Guestrooms included in the FEIR evaluation (consisting of 87 guestrooms) was located in APZ-II and approximately 350 feet from the outer edge of APZ-II. The present proposal provides for 113 guestrooms in this same general location.

It is anticipated that the Oxford Building will remain as administrative offices for the Hotel and is located outside of APZ-II.

ANALYSIS

The AICUZ is not regulatory, but rather a guidance document for local land use decision-making. The most recent published AICUZ was in 1984, in connection with the previous

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FEIR analysis, the Navy reported significant operational changes since 1984, including the off-shore routings to Runway 29. Among the indicators of current Navy operations are their published visual and instrument procedures. See Exhibit D and Exhibit E. Pursuant to these published procedures, the visual approaches to Runway 29 are conducted approximately 2,400 feet off-shore of the hotel property. The instrument approach is also offset towards the ocean, approximately 1,100 feet from the hotel property. These approaches over water rather than over the hotel property thus reducing the risk of an accident occurring on the hotel property.

APZ II is 3,000 feet wide, mostly over water. Because the proposed changes to the Hotel site are very close to the outer edges of the APZ, an interpretation of the land use guidelines is appropriate. In this case, the land use guidelines for the proposed hotel development change abruptly from no restriction in the original Conference Facility location to "Clearly Incompatible" when the Conference Center is placed 250 feet into APZ-II. As discussed above, the risk diminishes towards the outer edges of the zone, where the new structures are located. While the level of risk exposure changes somewhat when moving from one side of the line to the other, this change is not significant.

Furthermore, as note in Appendix B of the AICUZ, "Since no listing (land use category) is absolutely comprehensive, and the evolution of land uses changes over time, it is necessary that discretion be used in applying the criteria of the Instruction to specific local cases". "Consideration should be given to the local environment, topography, existing land use, and design features of any proposed development."

Here, the local environment is highly developed and includes existing land uses within or adjacent to the APZ's including the ten 17-story Coronado Shores condominium towers and the Hotel del Coronado resort site, which includes the seven-story Ocean Towers. Given the density of the surrounding land uses, the incremental change within the designated APZ zone on the hotel site is not significant. Topographical features include the immediate adjacency of the ocean for an emergency landing over water. Design features of the Conference Center and South Beach Guestrooms which would serve to mitigate the consequence should an accident occur, include such safety features as sprinklers, exit lighting, emergency lighting, etc., in compliance with current building code requirements.

CONCLUSIONS

The FEIR found that "Implementation of the proposed Master Plan Improvements would increase the number of people and buildings that are exposed to the risk if an accident were to occur, however it would not significantly alter the existing risk exposure nor create an adverse impact on public safety".

Likewise, and for the following reasons, this analysis concludes that the incremental changes proposed in the Hotel del Coronado Amended Master Plan do not significantly alter the risk exposure as compared to the approved Master Plan, nor create an adverse impact on public safety. Consistent with the FEIR, no mitigation is required.

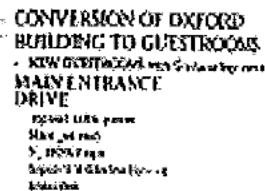
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EXHIBIT A - Original Hotel Master Pl.

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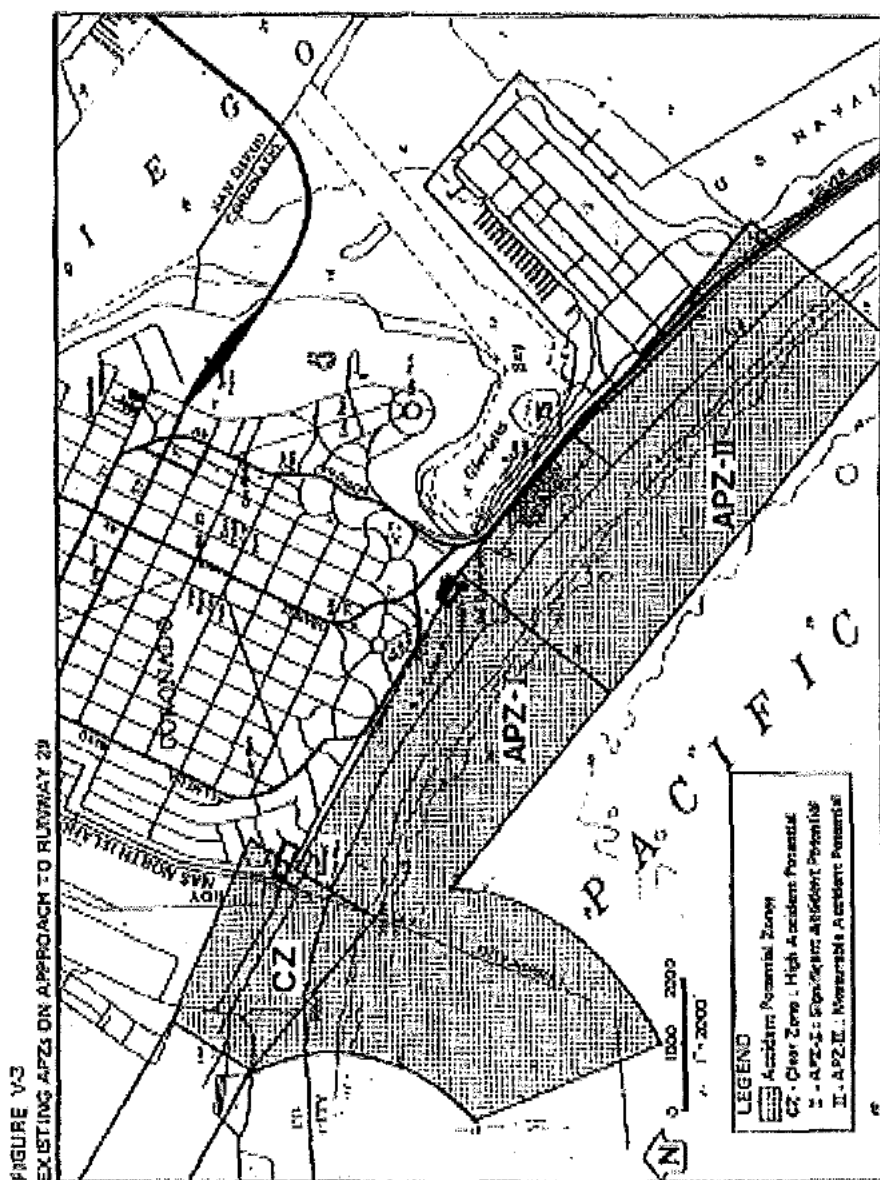


Exhibit B - APZs on Approach to Runway 29

AIR INSTALLATIONS COMPATIBLE USE ZONES STUDY,
 WESTERN DIVISION NAVAL FACILITIES ENGINEERING COM

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EXHIBIT C - Amended Hotel Master Plan

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DEPARTMENT OF THE NAVY
COMMANDING OFFICER
NAVAL BASE CORONADO
PO BOX 367033
SAN DIEGO, CA 92136-7033

IN REPLY REFER TO:

11000
Ser/092
30 MAR 12

City of Coronado
Attn: Blair King, City Manager
1825 Strand Way
Coronado, CA 92118

Dear Mr. King:

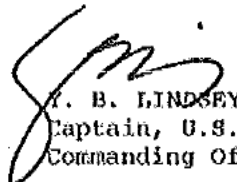
SUBJECT: NAVAL AIR STATION NORTH ISLAND (NASNI) AND NAVAL OUTLYING
LANDING FIELD IMPERIAL BEACH (NOLF IB) AIR INSTALLATION
COMPATIBLE USE ZONES (AICUZ) STUDY

The above referenced AICUZ Study has been approved and the enclosed hard copy and electronic copy is submitted for your use. I ask that you consider the AICUZ Study's recommendations during any reviews and/or updates of the City of Coronado's general plan, specific plans, zoning ordinances, building regulations and or individual land use initiatives within the influence areas identified in the study.

An electronic copy has also been given to the San Diego County Regional Airport Authority and we are in the process of placing a hard copy at the Coronado Public Library, 640 Orange Avenue.

We are prepared to meet with you and other city leadership, at your convenience, to address any questions or concerns you may have. We are also developing our plans for public outreach, which we expect to conduct not later than mid-May. A forthcoming press release notice will detail specific public outreach dates, list a web link to access the AICUZ Study (<http://www.cnlc.navy.mil/Coronado/OperationsAndManagement/Operations/AirOperations/AICUZ/index.htm>) and offer other informational instructions concerning the AICUZ Study release.

My point of contact for this AICUZ Study is Carl Shaffer, AICP, Community Plans and Liaison, at (619) 545-4134 or email at carl.shaffer@navy.mil.


T. B. LINDSEY
Captain, U.S. Navy
Commanding Officer

Copy to:
San Diego County Regional Airport Authority, Attn: Angela Jamison
City of Imperial Beach, Attn: Gary Brown